

42

Case 2:10-cv-10978-PJD-MJH

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED

2010 NOV 19 A 11:48

U.S. DIST. COURT CLERK
EAST DIST. MICH
FLINT

AMERICAN UNIVERSITY OF ANTIGUA,
COLLEGE OF MEDICINE, a foreign corporation,

Plaintiff,

V

CASE No.: 2:10-cv-10978-PJD-MJH
Judge Patrick J. Duggan

STEVEN WOODWARD,

Defendant,

Defendants Response to Plaintiff's Motion to Compel

Defendants Response to Plaintiff's Motion to Compel

List of Exhibits:

Exhibit 1: Email Exchange with Eric A. Buikema, Nov 2
Exhibit 2: Staples Receipts
Exhibit 3: Notarized Copy, Susan Zonia, MD
Exhibit 4: Interrogatories Case No. 07-088103-CZ
Exhibit 5: Economictimes.indiatimes.com
Exhibit 6: Manta.com
Exhibit 7: USMLE Step 1 Scores and Grade Point Averages
Exhibit 8: 5th Semester Final Grades
Exhibit 9: Oakland County Circuit Court Docket January 19, 2009
Exhibit 10: Oakland County Circuit Court Docket November 4, 2008
Exhibit 11: Email Exchange with Eric A. Buikema, Nov 3

The Defendant was more than willing to comply with all requests made by the Plaintiff concerning Discovery until the Defendant found out that the Plaintiff was altering and/or deleting evidence for the upcoming trial.

The Plaintiff is forcibly seeking discovery for unethical purposes.

The Plaintiff is attempting to discover evidence with the intent to alter and/or delete the evidence.

The Plaintiff's character of deleting and/or altering evidence, as well as falsifying documentation is demonstrated in Docket 51 "Defendants Motion for Sanctions and Motion for Dismissal".

The Plaintiff does **NOT** provide Discovery Materials in good faith.

The Plaintiff has failed to provide the most basic Discovery material to the Defendant violating Rule 7.1 Disclosure Statement.

The Plaintiff seeks to cover-up the disclosure of private student information for unethical purposes..

The Plaintiff has no evidence to support their Docket 1 claims and is seeking anything and everything to smear the Defendant before the Court.

The Plaintiff has tried to obtain a Preliminary Injunction, without success, because they lack the evidence to support their frivolous claims.

(1) The Defendant was more than willing to copy and exchange exhibits as seen in the email transactions between the Defendant and Plaintiff (Exhibit 1).

The Defendant spent considerable time and money preparing copies of exhibits for the exchange as seen in the receipts on the Staples copy receipts (Exhibit 2)

The Defendant asked the Plaintiff to suggest a date and location for the exchange and/or view exhibits on or about October 27, 2010 (Exhibit 1, page 2 bottom).

"I will mail you the Exhibits, files and documentation you requested.

If you still require to see the fiber optic training device and the books I plan on bringing to the court please let me know and I will meet you half way between Flint and your office."

The Defendant had to **remind** the Plaintiff of this exhibit exchange, as demonstrated in the email(Exhibit 1, page 2, top), on or about, 11/2/2010 1:15 PM.

This email supports the fact that the Defendant was willing to supply exhibits.

In the same email the Defendant requested that the Plaintiff bring all their exhibits to the meeting place.

"I have not received a reply from the Plaintiff with regards to meeting me to see my exhibits.

Please let me know when you would like to meet so you can view the exhibits. I would prefer a public place halfway between Flint and your office.

Instead of mailing you the paper copy of my exhibits I will bring them with me, to the mutually agreed upon public location, so you can witness and sign that you have received said exhibits.

Please contact me with the date and time you would like to meet, so I can determine if I am available to meet you.

At the same meeting please bring copies of all your exhibits so I can sign that I have received them."

The Plaintiff replied that the exchange of exhibits was not required at this time as seen in the email (Exhibit 1, page 1, bottom, 2nd paragraph) dated, on or about, 11/2/2010 1:39:20 PM.

This email reply (Defense Exhibit 1) was from the Plaintiff (Plaintiff Exhibit 3 of their Docket 47).

"The court has issued a new scheduling order and denied your motion for protective order as moot.

This means that the obligations of the parties for preparation of the final pretrial order, **including an exchange of exhibits, has been put off to a future date. We are under no obligation to do that exchange now."**

(2) The Defendant could not meet the Plaintiff on November 4, 2010 as stated in the email reply to the Plaintiff, on or about, November 2, 2010 4:23:25.

The Defendant caught the Plaintiff deleting and/or altering evidence for the case, as exposed in Docket 51 "Defendants Motion for Sanctions and Motion for Dismissal".

The Defendant could not meet the Plaintiff for the depositions since they had a previous appointment with a Notary Public on November 4, 2010 (Exhibit 3).

The Defendant had to hire the Notary Public, to witness evidence, because the Plaintiff is untrustworthy and was deleting and/or altering evidence.

The Defendant could not meet the Plaintiff on November 8, since the Defendant had to prepare their motion concerning the Plaintiff's violations and unethical activities as referenced in Docket 51.

This undue burden includes this document as well as reviewing and verification of exhibits for other alterations or deletions made by the Plaintiff.

The Defendant has suffered undue burden and cost because of the Plaintiff.

The Defendant has to review all exhibits comparing them to the Notarized copies to determine if there are other violations the Plaintiff has made.

The Defendant and the Court now endure undue burden and expense because the Plaintiff has violated 18 U.S.C 1506 by altering or deleting evidence.

(3) The Plaintiff did not have a set or confirmed date for any deposition for the Defendant.

The Defendant filed a Motion for Protective Order on or about October 27th.

The Defendant did not learn that this order was moot until on or about November 2.

As soon as the Plaintiff learned of the moot they demanded that the Defendant be deposed at their convenience not any agreed upon time or date (Exhibit 1, page 1 Bottom)

"Requires you to produce the documents listed in the notice at the time of your deposition on November 4th".

They not only demanded a deposition at their convenience, but also demanded Exhibits from the Defendant, but refused to exchange any documentation with the Defendant (Exhibit 1, page 1 Bottom)

“We are under no obligation to do that exchange now”

As previously stated the Defendant had already scheduled an appointment with a Notary Public on November 4th, because the Plaintiff had deleted and/or altered evidence for the upcoming trial, Docket 51.

The Plaintiff contacted the Defendant on November 3rd rescheduling the deposition for November 8th (Exhibit 11, page 2 Top)

“Mr. Buikema is available on Monday, November 8 at 10:00 a.m. for your deposition”

The Defendant could not make these dates since they required time to prepare the Docket 51 concerning the Plaintiff's violations of deleting and/or altering evidence for the upcoming trial.

On November 3rd, the Plaintiff demanded that the Defendant be deposed the following day, November 4th, which the Defendant could not do. (Exhibit 11, page 1, middle)

“We will expect to see you tomorrow then.”

The Defendant replied that they could not meet the next day, (Exhibit 11, page 1)

“I will not be available tomorrow as previously stated”

The Plaintiff then threatens the Defendant with a motion to seek costs for a deposition that was never confirmed, adequately communicated, or scheduled.(Exhibit 11, page 1, top)

“We will file a motion and seek costs of same in that event”

(4) The Plaintiff has a history of not performing their duty concerning Discovery in good faith.

The Defendant asks the Court to read a copy of Interrogatories filled out by the Plaintiff (Exhibit 4). At this time this Plaintiff was a Defendant in Case No. 07-088103-CZ.

Of the 53 Interrogatories they objected to 36, did not bother to answer 15, and only answered two.

Answering Interrogatory 10 “Unknown at this time” and 51 “No”.

They objected to All document requests.

This demonstrates the unethical character of this Plaintiff concerning Discovery.

(5) The Plaintiff has violated Federal Rule 7.1 Disclosure Statement
The Plaintiff has failed to release parent company information.

The Defendant has evidence that American University of Antigua College of Medicine is associated with Manipal Education(Exhibit 5) and Greater Caribbean Learning Resources, GCLR incorporated in New York, NY(Exhibit 6).

(6) The Plaintiff is using this Court to cover-up evidence of their disclosure of student grades, violating the Plaintiff's own policies, contracts, and laws concerning student privacy.

The Plaintiff's Docket 1 claims and the multiple requests for Preliminary Injunctions against the Defendant is evidence of this fact.

During the 5th Semester Clinical Orientation the Plaintiff distributed a PowerPoint presentation containing USMLE Step 1 grades as well as Student Grade Point Averages of approximately 150 students (Exhibit 7).

The Defendant learned of this disclosure and notified the Department of Education and as many students as they could. The Plaintiff is using these proceedings to cover-up the fact that they disclosed these student grades.

(7) The Plaintiff disclosed the Final Grades (Exhibit 8) for a 5th Semester Clinical program, taught at St Joseph Mercy Oakland Hospital in Pontiac, Michigan.

This disclosure uncovered evidence that the Plaintiff commits fraud and perjury.

The Plaintiff falsified(fixed) the Final Grades(Exhibit 8) for students enrolled in a Clinical course at St Joseph Mercy Oakland Hospital in Pontiac, Michigan.

The Defendant's Final Grades were falsified from an **80%** to an **"F"** for the purposes of committing perjury as presented before Judge Shalina Kumar of Oakland County Circuit Court(Exhibit 9) **"Woodward took and failed the fifth semester Final Exam."** and **"Woodward received an "F" for the fifth semester"**

In the "Brief in Support of Answer to Plaintiff's Motion for Entry of Default and Judgment" (Exhibit 10) to Judge Shalina Kumar, the Plaintiff wrote **"washed out"** concerning Steven Woodward, which is a total absolute lie before the Court and fraud against Steven Woodward.

The following are more examples of fraud committed against other students during the same course at St Joseph Mercy Oakland Hospital(Exhibit 8).

The Plaintiff assigned the grade of “C” to the person that had the **lowest grades** (76%) in the course, **Vishal Chheda**, while giving a lower grade, (C-), to **Lekedra Evans** who earned an **83%** in the course.

Michael Ozuomba also outperformed Vishal Chheda, earning a **77%** in the course, but was given an “F” for the course.

This one course cost each student approximately \$12,000 for just school fees.

(8)The Plaintiff does not have the evidence to support Docket 1 claims.

The Plaintiff wrongfully filed a request for Default against the Defendant.

The Plaintiff is attempting to use the Court to cover-up evidence concerning their disclosure of private student information.

Docket 51 demonstrates that the Plaintiff has destroyed or altered evidence that was verbally disclosed by the Defendant during the Hearing on or about 4/19/2010.

The Plaintiff filed the “Motion to Compel” without just cause for a deposition that was never adequately scheduled.

The Defendant requests the Court DENY the Plaintiff’s “Motion to Compel”.

A handwritten signature in black ink, appearing to read "H. Ozuomba", with a long horizontal flourish extending to the right.

From: Steve Woodward (steve_l_woodward@yahoo.com)
To: ebuikema@cardellilaw.com;
Date: Tue, November 2, 2010 4:23:25 PM
Cc:
Subject: Re: AUA v Woodward - Exhibits

I will not be able to attend the November 4th deposition.
The following week is better for me.

Steven Woodward.

This email and any attachments are intended for the sole use of the named recipient(s) and contain(s) confidential information that may be proprietary, privileged or copyrighted under applicable law. If you are not the intended recipient, do not read, copy, or forward this email message or any attachments. Delete this email message and any attachments immediately.

From: Eric A Buikema <ebuikema@cardellilaw.com>
To: Steve Woodward <steve_l_woodward@yahoo.com>; Kathryn Zalewski <kzalewski@cardellilaw.com>; Orem Court <marilyn_orem@mied.uscourts.gov>
Cc: Paul M. Kittinger <pkittinger@cardellilaw.com>
Sent: Tue, November 2, 2010 1:39:20 PM
Subject: Re: AUA v Woodward - Exhibits

Mr. Woodward,

Please do not include the court on routine correspondence between the parties, it is busy enough. I cannot tell you or advise you what to do, but if you wish to address the court, or invoke its assistance, it is my suggestion that you do so by proper motion.

The court has issued a new scheduling order and denied your motion for protective order as moot. This means that the obligations of the parties for preparation of the final pretrial order, including an exchange of exhibits, has been put off to a future date. We are under no obligation to do that exchange now.

Having said that, your deposition notice is "decus tecum" and requires you to produce the documents listed in the notice at the time of your deposition on November 4th. Please review that carefully and comply by your personal attendance and by production of those materials.

Regards,

Eric A. Buikema, Attorney at Law
Cardelli, Lanfear & Buikema, P.C.
322 West Lincoln Avenue
Royal Oak, Michigan 48067
(248) 544-1100
(248) 544-1191 fax
ebuikema@cardellilaw.com

EXHIBIT 1

On 11/2/10 1:15 PM, "Steve Woodward" <steve_l_woodward@yahoo.com> wrote:

I have not received a reply from the Plaintiff with regards to meeting me to see my exhibits.

Please let me know when you would like to meet so you can view the exhibits.

I would prefer a public place halfway between Flint and your office.

Instead of mailing you the paper copy of my exhibits I will bring them with me, to the mutually agreed upon public location, so you can witness and sign that you have received said exhibit.

Please contact me with the date and time you would like to meet, so I can determine if I am available to meet you.

At the same meeting please bring copies of all your exhibits so I can sign that I have received them.

Sincerely,

Steven Woodward

This email and any attachments are intended for the sole use of the named recipient(s) and contain(s) confidential information that may be proprietary, privileged or copyrighted under applicable law. If you are not the intended recipient, do not read, copy, or forward this email message or any attachments. Delete this email message and any attachments immediately.

From: Steve Woodward <steve_l_woodward@yahoo.com>

To: Kathryn Zalewski <kzalewski@cardellilaw.com>; Orem Court
<marilyn_orem@mied.uscourts.gov>

Sent: Wed, October 27, 2010 9:52:41 AM

Subject: AUA v Woodward - 10-20-10 from Eric Buikema

I will not attend the deposition. I am filling a "Motion for Protective Order".

I will mail you a copy to your office, later today, after I have it stamped at the Court.

I will mail you the Exhibits, files and documentation you requested.

If you still require to see the fiber optic training device and the books I plan on bringing to court please let me know and I will meet you half way between Flint and your office.

Thank you for your time,

Steven Woodward.

This email and any attachments are intended for the sole use of the named recipient(s) and contain(s) confidential information that may be proprietary, privileged or copyrighted under applicable law. If you are not the intended recipient, do not read, copy, or forward this email message or any attachments. Delete this email message and any attachments immediately.

From: Kathryn Zalewski <kzalewski@cardellilaw.com>
To: Steve_L_woodward@yahoo.com
Sent: Thu, October 21, 2010 3:54:56 PM
Subject: AUA v Woodward - 10-20-10 from Eric Buikema

AUA v Woodward - 10-20-10 from Eric Buikema

<<10-20-10 ltr to woodward - rule 26 disclosure.pdf>>

Sincerely,

Kathy Zalewski

Legal Secretary

Cardelli, Lanfear & Buikema, P.C.

322 W. Lincoln

Royal Oak, MI 48067

(248) 544-1100

kzalewski@cardellilaw.com

This transmissison may contain information that is privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of the information contained herein (including any reliance thereon) is **strictly prohibited**. If you received this transmission in error, please contact the sender and destroy the material in its entirety, whether in electronic or hard copy format. Thank you.

STAPLES

that was easy:

Low prices. Every item. Every day
 Store No.1899
 6272 Saginaw Road
 GRAND BLANC, MI 48439
 (810) 953-0966

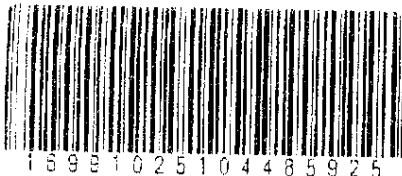
252525 XX 025 44859

Receipt #: 44859
 VISA #: XXXXXXXXXXXX3976
 10/25/10 11:43

Qty	Description	Amount
244	BW SS P@SS Ltr/Lgl-632551	21.96
79	BW SS P@SS Ltr/Lgl-632551	7.11
49	BW SS P@SS Ltr/Lgl-632551	4.41
SubTotal		33.48
Standard Tax 6.00%		2.01
Total		35.49

The Cardholder agrees to pay the Issuer of the charge card in accordance with the agreement between the Issuer and the Cardholder.

Compare and Save
 with Staples-brand products.
 THANK YOU FOR SHOPPING AT STAPLES!



 The total charge on your card will
 include multiple transactions
 reflected on this receipt.

STAPLES

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Low prices. Every item. Every day
 Store No.1899
 6272 Saginaw Road
 GRAND BLANC, MI 48439
 (810) 953-0966

252525 XX 025 44853

Receipt #: 44853
 VISA #: XXXXXXXXXXXX3976
 10/24/10 18:00

Qty	Description	Amount
203	BW SS P@SS Ltr/Lgl-632551	18.27
SubTotal		18.27
Standard Tax 6.00%		1.10
Total		19.37

The Cardholder agrees to pay the Issuer of the charge card in accordance with the agreement between the Issuer and the Cardholder.

Compare and Save
 with Staples-brand products.
 THANK YOU FOR SHOPPING AT STAPLES!



 The total charge on your card will
 include multiple transactions
 reflected on this receipt

EXHIBIT 2

1

STAPLES

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Store No:1898
 6272 Saginaw Road
 GRAND BLANC, MI 48439
 (810) 953-0868

252525 XX 025 44772

Receipt #: 44772

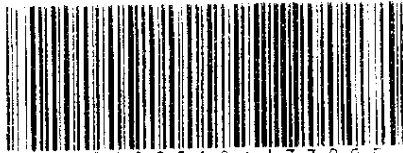
VISA #: XXXXXXXXXXXXX3976

10/22/10 14:43

Qty	Description	Amount
478	BW SS P@SS Ltr/Lgl-632551	43.11
	SubTotal	43.11
	Standard Tax 6.00%	2.59
	Total	45.70

The Cardholder agrees to pay the issuer of the charge card in accordance with the agreement between the issuer and the Cardholder.

Compare and Save
 with Staples-brand products
 THANK YOU FOR SHOPPING AT STAPLES!



16991022104477225

16991022104477225

The total charge on your card will
 include multiple transactions
 reflected on this receipt

STAPLES

that was easy:

Low prices. Every item. Every day.

Store No:1898
 6272 Saginaw Road
 GRAND BLANC, MI 48439
 (810) 953-0868

252525 XX 025 44845

Receipt #: 44845

VISA #: XXXXXXXXXXXXX3976

10/24/10 17:13

Qty	Description	Amount
480	BW SS P@SS Ltr/Lgl-632551	43.20
5	BW SS P@SS Ledger-632552	0.85
5	BW SS P@SS Ltr/Lgl-632551	0.45
	SubTotal	44.50
	Standard Tax 6.00%	2.87
	Total	47.17

The Cardholder agrees to pay the issuer of the charge card in accordance with the agreement between the issuer and the Cardholder.

Compare and Save
 with Staples-brand products.
 THANK YOU FOR SHOPPING AT STAPLES!



16991024104484525

16991024104484525

The total charge on your card will
 include multiple transactions
 reflected on this receipt.

FROM: CONTACT PAGE | RESUME | IMAGE | CONTACT | NEWS | ABOUT

AUA NEWSPAPER

REQUEST VIEWBOOK

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Susan Zonia, MD

Dr. Zonia received her Ph.D. in Sociology, with an emphasis on complex organizations and research methods, from Michigan State University in 1984. She served on the faculty of Wayne State University, in Detroit Michigan, and Michigan State University for a number of years. Dr. Zonia became involved in graduate medical education in 1992. Since then, she has played a central role in developing new internships, residency and fellowship programs. In 1999, Dr. Zonia completed a Fellowship in Health Policy. Currently, she serves as the Director of Medical Education for St. Joseph Mercy-Oakland Hospital in Pontiac, Michigan. She is also the Chair of the hospital's Institutional Research Board, overseeing all human subject research. She is a Board Member of AHME (Association of Hospital and Medical Educators) and is a Fellow, and the President-Elect of AODME (Association of Osteopathic Directors and Medical Educators).



Susan Zonia
MD

1-(888) 787-8633 (1-888-AUA-UMED) - TOLL-FREE ADMISSIONS LINE | 1-4212/J61-RYK - GENERAL QUESTIONS
 AMERICAN UNIVERSITY OF ANTIGUA G/O/GOLR, L.L.C. | 12 WALL STREET, 10TH FLOOR | NEW YORK, NY 10005

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CARIBBEAN MEDICAL SCHOOL

Kinda Ann Bennett
November 4, 2010

JOHN B. BENTT
 VICE PRESIDENT OF THE
 BOARD OF THE
 CARIBBEAN MEDICAL SCHOOL
 APR 30, 2010

EXHIBIT 3

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

STEVEN WOODWARD

Plaintiff,

v

TRINITY HEALTH-MICHIGAN,
a Michigan Nonprofit corporation,
SUSAN CATHERINE ZONIA, an individual,
AMERICAN UNIVERSITY OF ANTIGUA
A Foreign corporation,

Defendants,

NICOLETTI & ASSOCIATES, P.C.

Paul J. Nicoletti (P44419)
Attorney for Plaintiff
39520 Woodward Ave., Ste 200
Bloomfield Hills, MI 48304
(248) 203-7800 / Fax: (248) 203-7801
paul@nicoletti-associates.com

LAW OFFICES OF BRYAN L. SCHEFMAN
Bryan L. Schefman (P35435)
Attorney for Defendant American
University of Antigua College of Medicine
322 North Old Woodward Ave.
Birmingham, MI 48009
(248) 723-1650

LAW OFFICE OF DAVID B. GUNSBERG,
P.C.

David B. Gunsberg (P24235)
Attorney for Defendant Trinity Health-Michigan
and Susan Catherine Zonia;
Co-Counsel for Defendant American University
of Antigua College of Medicine
322 North Old Woodward Ave.
Birmingham, MI 48009
(248) 646-9090

RECEIVED
OCT 19 2008

BY:.....

Case No. 07-088103-CZ
Hon. Shalina Kumar

**DEFENDANTS' OBJECTIONS TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES AND REQUEST FOR DOCUMENTS TO DEFENDANTS**

NOW COMES Defendants by and through their attorney, Law Offices of David B. Gunsberg, P.C., and pursuant to rule 2.309 and 2.310 of the Michigan Rules of Court states the following as their objections to Plaintiff's First Set of Interrogatories and Request for Documents to Defendants.

EXHIBIT 4

INTERROGATORIES

In accordance with the applicable rule, the Interrogatory answers should include information obtained by and available to Defendants and their agents, servants, private investigators, experts and attorneys and be returned within twenty-eight (28) days.

These Interrogatories are to be regarded as continuing and you are requested to provide, by way of supplementary answers thereto, such additional information as may hereafter be obtained by you or any person on your behalf which will augment or otherwise modify any answers now given to the Interrogatories.

DEFINITIONS OF TERMS AND INSTRUCTIONS

When identification of any person is requested herein, give their:

- A. Name;
- B. Current address; and
- C. Employer, if any

When identification of any document, correspondence, order, or any other writing is requested, give its:

- A. Date;
- B. Author or addressor;
- C. Address;
- D. Recipients of all copies;
- E. Present location thereof;
- F. Identity of all persons presently in custody, control, or possession thereof; and
- G. State whether you will produce it upon request without the necessary court order.

In lieu of such identification, you may furnish documents for inspection and copying at the time you file answers to these Interrogatories. As used herein, person or party includes any individual, corporation, partnership, group, association, or any other organization. As used herein, document includes the original and all copies of correspondence, records, schedules, tables, charts, reports, memoranda, notes, letters, telegrams, invoices, orders, order forms, messages (including reports of telephone conversations and conferences), minutes, and inter and intra office communication, and all other written or printed matter of any kind. When requested to state the factual basis of any allegation in your answer to the Complaint or proceeding, answer to any Interrogatory, identify each occurrence, incident, and the fact upon which you rely to support such allegation or answer, including:

- A. The date thereof;
- B. The place thereof;
- C. The substance of each occurrence, incident and fact;
- D. Identification of each person who participated therein;

- E. Identification of each person present; and
- F. The source of your knowledge thereof.

INTERROGATORY NO. 1:

Identify the individual or individuals answering these Interrogatories providing their full name and all nicknames by which they have been known, address, phone number, and occupation/title.

ANSWER:

INTERROGATORY NO. 2:

State whether prior to answering these interrogatories, you have examined all information and documents available to you relating to the subjects of the interrogatories.

ANSWER: ☒ Objected to as overly broad, vague and unable to be answered in the manner promulgated.

INTERROGATORY NO. 3:

If your answer to Interrogatory No. 2 is negative, identify the information and documents that you did not examine and state the reason that you did not examine such information and documents.

ANSWER: ☒ Objected to as overly broad, vague and unable to be answered in the manner promulgated.

INTERROGATORY NO. 4:

If you consulted a person, technician(s) or other expert(s), for any purpose to be used in preparation of this matter for litigation, please provide person(s) name, profession or occupation, the field in which he/she allegedly is an expert, and whether you intend to call him/her as a witness during the trial of this case.

ANSWER: ☒ Objected to as calling for attorney work product.

INTERROGATORY NO. 5:

Identify each person who has knowledge of any of the facts and circumstances surrounding this lawsuit, including but not limited to the transaction between Plaintiff and Defendant, the allegations contained in Plaintiff's Complaint, and the responses contained within Defendant's Answer.

ANSWER: ☒ Objected to as overly broad, ambiguous, vague, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff is referred to Defendant's Witness List.

INTERROGATORY NO. 6:

Provide a detailed description of the testimony you expect to elicit from the person(s) listed in No. 5 above.

ANSWER: ~~Objected~~ to as seeking attorney work product.

INTERROGATORY NO. 7:

If you have ever spoken to the Plaintiff or a representative of same, please identify for each conversation, the dates, place at which the conversation took place, reason for the conversation, individuals present during, and what was said during the conversation by all parties.

ANSWER: ~~Objected~~ to as vague, overly broad, and unable to be answered in the manner promulgated.

INTERROGATORY NO. 8:

Set forth the names, addresses, telephone numbers and identification of all other witnesses who you contemplate calling at the time of the trial of the above-captioned matter, indicating with respect to each witness, the nature of the allegations or facts that the witnesses will be called upon to support.

ANSWER: ~~Objected~~ to as seeking attorney work product.

INTERROGATORY NO. 9:

Please list and describe all exhibits upon which you intend to rely on in this matter, and whether you will allow us to obtain copies of those exhibits without the necessity of a motion? (Exhibits includes any exhibits that you intend to use from the inception of this lawsuit through its final adjudication)

ANSWER: ~~Objected~~ to as seeking attorney work product.

INTERROGATORY NO. 10:

If you contend that any party, person or entity violated or failed to comply with any statute, ordinance, law, regulation or standard in connection with this case, cite, enumerate or otherwise fully describe each such statute, ordinance, law, regulation, or standard or attach copies, identify the person or entity who violated or failed to comply with each matter; and describe the manner of each violation or failure to comply.

ANSWER: Unknown at this time.

INTERROGATORY NO. 11:

State the exact basis for each and every, if any, Affirmative Defense contained in Defendant's Answer, produce any and all documents to substantiate each and every, if any, Affirmative Defense.

ANSWER: ~~Objected~~ to as overly broad, ambiguous and unable to be answered in the manner promulgated.

INTERROGATORY NO. 12:

State the exact basis for each and every denial contained in Defendants' Answer, produce any and all documents to substantiate each and every, if any, such denials.

ANSWER: Objected to as overly broad, ambiguous and unable to be answered in the manner promulgated.

INTERROGATORY NO. 13:

State the employment description(s), and title(s) held by Susan Zonia at American University of Antigua and Trinity Health, during 2007.

ANSWER:

INTERROGATORY NO. 14:

State and all medical degree(s) earned by Susan Zonia.

ANSWER:

INTERROGATORY NO. 15:

When did Susan Zonia take the USMLE Step I exam?

ANSWER:

INTERROGATORY NO. 16:

Did Susan Zonia communicate with Plaintiff prior to December 17, 2007?

ANSWER:

INTERROGATORY NO. 17:

If Interrogatory No. 16 is answered in the affirmative, please state the following information with regarding to said communication(s):

- A. Date(s) of all communication between Plaintiff and Susan Zonia prior to December 17, 2007.
- B. The location(s) of all communication(s) between Plaintiff and Susan Zonia prior to December 17, 2007.
- C. The duration(s) of all communication(s) between Plaintiff and Susan Zonia prior to December 17, 2007.
- D. Any and all known witnesses to all communication(s) between Plaintiff and Susan Zonia prior to December 17, 2007.
- E. Any and all known individual(s) involved with all communication(s) between Plaintiff and Susan Zonia prior to December 17, 2007.
- F. The subject matter of all communication(s) between Plaintiff and Susan Zonia prior to December 17, 2007.

ANSWER: Objected to as overly broad, ambiguous, vague, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 18:

State the names, and positions held by any and all individual(s) referred to as "we" in the correspondence attached as **Exhibit 1**.

ANSWER: Objected to as overly broad, ambiguous, vague, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 19:

State the names, and positions held of any and all individual(s) who participated in the Grievance Committee hearing against Plaintiff on December 19th, 2007.

ANSWER: Objected to as overly broad, ambiguous, vague, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 20:

How many Grievance Committee hearings against AUA students took place between 2006, and 2008.

ANSWER: Objected to as overly broad, ambiguous, vague, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 21:

State the outcome and/or recommendation resulting from each of the Grievance Committee hearings against AUA students between 2006, and 2008.

ANSWER: Objected to as overly broad, ambiguous, vague, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 22:

Identify what documents, and testimony you intend to set forth to substantiate the claims of Mr. Woodward's "attitude and demeanor" as stated in Exhibit 1.

ANSWER: Objected to as seeking attorney work product.

INTERROGATORY NO. 23:

Have Defendants addressed Mr. Woodward regarding attitude and demeanor at St Joseph, prior to December 17, 2007?

ANSWER: Objected to as overly broad, ambiguous, vague, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 24:

If Interrogatory No. 23 is answered in the affirmative, please state the following information with regarding to said communication(s):

- A. Date(s) of all communication between Plaintiff and Defendants prior to December 17, 2007.
- B. The location(s) of all communication(s) between Plaintiff and Defendants prior to December 17, 2007.
- C. The duration(s) of all communication(s) between Plaintiff and Defendants prior to December 17, 2007.
- D. Any and all known witnesses to all communication(s) between Plaintiff and Defendants prior to December 17, 2007.
- E. Any and all known individual(s) involved with all communication(s) between Plaintiff and Defendants prior to December 17, 2007.
- F. The subject matter of all communication(s) between Plaintiff and Defendants prior to December 17, 2007.

ANSWER: Objected to as overly broad, ambiguous, vague, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 25:

State the date(s) and location(s), and witness(es) for each claim that Mr. Woodward allegedly "vented his anger toward the program" as stated in Exhibit 1.

ANSWER: Objected to as overly broad, ambiguous, vague, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 26:

State the date(s) and location(s), and witness(es) for each claim that Mr. Woodward allegedly engaged in unreasonable dialogue with representative of the school as stated in Exhibit 1.

ANSWER: Objected to as overly broad, ambiguous, vague, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 27:

State the employment description(s), and title(s) held by Dr. John Hayden at American University of Antigua and Trinity Health, during 2007.

ANSWER: Objected to as seeking irrelevant information and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 28:

Why did Dr. John Hayden state his appreciation for Plaintiff "feedback and the suggestions" as referenced in the correspondence attached as Exhibit 2.

ANSWER: Objected to as seeking irrelevant information and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 29:

Prior to December 17, 2007, did Susan Zonia have knowledge of the correspondence attached as Exhibit 2.

ANSWER:

INTERROGATORY NO. 30:

Prior to December 17, 2007, did anyone listed in the answer to Interrogatory No. 19 have knowledge of the correspondence attached as Exhibit 2.

ANSWER:

INTERROGATORY NO. 31:

Prior to December 17, 2007, did Susan Zonia have knowledge of the correspondence attached as Exhibit 3.

ANSWER: Objected to as seeking irrelevant information and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 32:

Prior to December 17, 2007, did anyone listed in the answer to Interrogatory No. 19 have knowledge of the correspondence attached as Exhibit 3.

ANSWER: Objected to as overly broad, vague and unable to be answered in the manner promulgated.

INTERROGATORY NO. 33:

On or before December 19, 2007, did anyone listed in the answer to Interrogatory No. 19 have knowledge of the correspondence attached as Exhibit 2.

ANSWER: Objected to as overly broad, vague and unable to be answered in the manner promulgated.

INTERROGATORY NO. 34:

On or before December 19, 2007, did anyone listed in the answer to Interrogatory No. 19 have knowledge of the correspondence attached as Exhibit 3.

ANSWER: Objected to as overly broad, vague and unable to be answered in the manner promulgated.

INTERROGATORY NO. 35:

When did Mr. Woodward state "waste of time" as reference in Exhibit 1.

ANSWER:

INTERROGATORY NO. 36:

State the date(s), time(s), and locations of any and all exams which Mr. Woodward allegedly sabotaged "by giving the same response to all questions to simply to get it over with." Exhibit 1.

ANSWER:

INTERROGATORY NO. 37:

State the basis for the statement that Mr. Woodward was "sabotaging" exams. Exhibit 1.

ANSWER:

INTERROGATORY NO. 38:

What were Mr. Woodward's evaluation scores for professionalism and communication skills between 2006 and 2007?

ANSWER:

INTERROGATORY NO. 39:

When and why was Mr. Woodward contacted via pager by Defendant?

ANSWER:

INTERROGATORY NO. 40:

Did Mr. Woodward ever fail to return Defendants' communication via pager.

ANSWER:

INTERROGATORY NO. 41:

If your answer in Interrogatory No. 40 is yes, state your basis for failing to contact, or Dr Brietenbach's office, or Plaintiff via telephone?

ANSWER:

INTERROGATORY NO. 42:

When did Mr. Woodward's pager number change?

ANSWER:

INTERROGATORY NO. 43:

State your basis for denying Mr. Woodward legal counsel or a recording device during his Grievance Committee hearing.

ANSWER: Objected to as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 44:

State the full and complete basis for the grievance procedures against Plaintiff on December 19, 2007.

Objected to as irrelevant and not reasonably calculated to lead to
ANSWER: the discovery of admissible evidence.

INTERROGATORY NO. 45:

Did Defendant(s) inform Plaintiff of the full and complete basis for the grievance procedures against Plaintiff held on December 19, 2007.

ANSWER: Objected to as irrelevant and not reasonably calculated to lead to
the discovery of admissible evidence.

INTERROGATORY NO. 46:

When was Plaintiff first informed of the grievance procedures scheduled for December 19, 2007.

ANSWER: Objected to as irrelevant and not reasonably calculated to lead to
the discovery of admissible evidence.

INTERROGATORY NO. 47:

Did Plaintiff submit written request for continuance of the Grievance Committee hearing scheduled for December 19, 2007.

ANSWER: Objected to as irrelevant and not reasonably calculated to lead to
the discovery of admissible evidence.

INTERROGATORY NO. 48:

Did Plaintiff submit written reason for the request for continuance of the Grievance Committee hearing scheduled for December 19, 2007.

ANSWER: Objected to as irrelevant and not reasonably calculated to lead to
the discovery of admissible evidence.

INTERROGATORY NO. 49:

State the basis for denying Plaintiff's request for a continuance of the Grievance Committee hearing on December 19, 2007.

ANSWER: Objected to as irrelevant and not reasonably calculated to lead to
the discovery of admissible evidence.

INTERROGATORY NO. 51:

Did Plaintiff provide written statement of appeal in accordance to the American University of Antigua Handbook?

ANSWER: No.

INTERROGATORY NO. 52:

On June 23, 2008, did Defendant(s) receive email containing Plaintiff's written notice of appeal including attached exhibits?

ANSWER: Objected to as irrelevant and not reasonably calculated to lead to
the discovery of admissible evidence.

INTERROGATORY NO. 53:

Did you Defendant(s) a hard copy of Plaintiff's written notice of appeal with attached exhibits on or before June 27, 2008?

ANSWER: Objected to as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 54:

State the basis for denying Plaintiff's written appeal on or before June 27, 2008.

ANSWER: Objected to as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

INSTRUCTIONS FOR REQUEST FOR DOCUMENTS

- a. You must serve a written response within 28 days after service of this request. Your response must state that production and related activities will be permitted as requested or that the requested production is objected to, in which event the reasons for your objection must be stated.
- b. Documents produced for inspection must be produced as they are kept in the usual course of business or be organized and labeled to correspond with the categories in this request.
- c. If you do not agree to allow the requested production at a reasonable time and on reasonable conditions, a motion may be filed seeking a court order requiring the requested production.
- d. The word "documents" means writings, drawings, graphs, charts, photographs, computer files, and other data compilations from which information can be obtained and translated into reasonably usable form.
- e. The words "you" and "your" mean you, your representatives, agents, insurers, attorneys, employees, directors, officers, subsidiaries, affiliates, and all others over whom you have control.

- f. The words "possession, custody, or control" mean all documents and things belonging to you that are in your possession, all documents and things belonging to others over which you have custody, and all documents and things in the custody of others over which you have the right to control.

DOCUMENTS REQUESTED

REQUEST NO. 1

All documents and evidence related to the answers, explanations, and denials to the Plaintiff's Complaint set forth in the Defendant's Answer to Complaint as well as the allegations contained in Defendant's Motion for Summary Disposition.

RESPONSE: Objected to as overly broad, ambiguous, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 2

Provide all minutes, and records of evidence considered at the October, 2006 Grievance Committee hearing against Plaintiff.

RESPONSE: Objected to as overly broad, ambiguous, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 3

Provide copies of all reports, findings, and recommendations from the October, 2006 Grievance Committee hearing against Plaintiff.

RESPONSE: Objected to as overly broad, ambiguous, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 4

Provide copies of minutes, and records of evidence considered at the December, 19, 2007 Grievance Committee hearing against Plaintiff.

RESPONSE: Objected to as overly broad, ambiguous, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 5

Provide copies of all reports, findings, and recommendations used to form the basis of Dr. Bell's recommendation to dismiss Plaintiff from American University of Antigua College of Medicine.

RESPONSE: Objected to as overly broad, ambiguous, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 6

Provide copies of minutes, and records of evidence considered at the July 10, 2008 hearing on Plaintiff's appeal.

Objected to as overly broad, ambiguous, seeking irrelevant information,
RESPONSE: not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 7

Provide copies of all reports, findings, and recommendations used to form the basis of denying Plaintiff's appeal his dismissal from American University of Antigua College of Medicine.

Objected to as overly broad, ambiguous, seeking irrelevant
RESPONSE: information, not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 8

Provide copies of all relevant provisions of the University's Student Handbook which allegedly require a "de novo review of the charges against you (Plaintiff) and of your defenses." (see attached correspondence).

Objected to as overly broad, ambiguous, seeking irrelevant
RESPONSE: information, not reasonably calculated to lead to the discovery of admissible evidence. No Attached correspondence.

REQUEST NO. 9

Produce a copy of the petition that Elizabeth Bullof and Lakedra Evens wrote to Defendant(s) between 2006 and 2007.

Objected to as overly broad, ambiguous, seeking irrelevant
RESPONSE: information, not reasonably calculated to lead to the discovery of admissible evidence. No Attached correspondence.

REQUEST NO. 10

All documents and evidence related to any Affirmative Defenses.

Objected to as overly broad, ambiguous, seeking irrelevant
RESPONSE: information, not reasonably calculated to lead to the discovery of admissible evidence. No Attached correspondence.

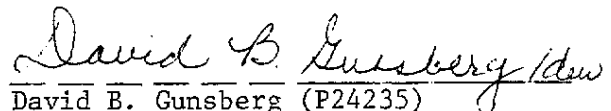
REQUEST NO. 11

Any and all documents to be relied upon at trial including.

Objected to as overly broad, ambiguous, seeking irrelevant
RESPONSE: information, not reasonably calculated to lead to the discovery of admissible evidence. No Attached correspondence.

Respectfully submitted.

LAW OFFICE OF DAVID B. GUNSBERG, P.C.


David B. Gunsberg (P24235)
Attorney for Defendants
322 North Old Woodward Ave.
Birmingham, MI 48009
248-646-9090

October 14, 2008

THE ECONOMIC TIMES

Mon, Nov 08, 2010 | Updated 07:27AM IST

5 DEC. 2008, 12:57AM IST, SARAH JACOB AND BOBY KURIAN, ET BUREAU

Manipal Education buys out Antigua University

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BANGALORE: In one of the biggest cross-border deals in the education space, Manipal Education has acquired the entire shareholding of American University of Antigua (AUA) from New York-based Greater Caribbean Learning Resources.

Manipal Education confirmed the buyout, but did not disclose the transaction size. However, sources said the company has raised \$115 million debt financing from ICICI Bank in recent weeks, which will be ploughed into the buyout as well as capex requirements for ramping up the campus.

ET first reported on the potential acquisition in its edition dated October 7. The Caribbean is a well-established market for medical students from the US mainland, where the availability of seats far outstrips demand. "We have completed the buyout, giving us control over AUA, which is among the top five medical education campuses in the Caribbean islands along with St George's University School of Medicine and Ross University," Anand Sudarshan, MD & CEO, Manipal Education, told ET.

"We saw a huge potential and strategic value in the acquisition as the Caribbean serves the unmet demand for medical seats in the US. The US is estimated to have 16,800 medical seats, while there are over 60,000 students who clear MCAT annually," Mr Sudarshan added.

AUA currently has over a 1,000 students on campus; the number will go up to 2,500 after Manipal builds a new campus in the near future. The US is currently short of over 75,000 doctors, and Manipal is keen on exploiting this opportunity by focussing on the Caribbean education industry.

Coupled with proximity to the US mainland and the secular nature of the US medical education system — which allows even AUA students to take the US Medical Licensing Examination — the Caribbean has become a cost-effective alternative for US students to secure a medical degree.

The deal marks Manipal Education's third M&A in 18 months. It had earlier acquired U21 Global, an online varsity, and MeritTrac, a skills assessment and testing firm. Manipal Education, in which the promoters hold 82% stake, has attempted to raise between \$100 and \$150 million from private equity investors. Before the market meltdown, banking sources said, the company's valuation was placed at around \$1.2 billion, making it probably the most valuable privately-owned education asset in the country.

Manipal Education, which is primarily into medical education with campuses in Malaysia, Nepal and Dubai, is estimated to end the current financial year with a topline of \$200 million.

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EXHIBIT 5



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Phone: (212) 661-8899

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About Greater Caribbean Learning Resources, Inc

Is this your company? Claim This Profile

Greater Caribbean Learning Resources, Inc is a private company categorized under Hospital, Medical School Affiliation and located in New York, NY. Our records show it was established in 2003 and incorporated in New York. Current estimates show this company has an annual revenue of 1,200,000 and employs a staff of approximately 14.

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Greater Caribbean Learning Resources, Inc Business Information

Greater Caribbean Learning Resources, Inc also does business as American Univ Antigua College .

Location Type Single Location

Annual Sales (Estimated) 1,200,000

Employees (Estimated) 14

SIC Code 8062, General Medical and Surgical Hospitals

NAICS Code 622110, General Medical and Surgical Hospitals

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North Shore - Long Island Jewish Health System, Inc Hospital, Medical School Affiliation in Great Neck, NY

North Shore - Long Island Jewish Health System, Inc Hospital, Medical School Affiliation in Manhasset, NY

EXHIBIT 6

Click on the reports tab at the top of the page to research company background, detailed company profile, credit and financial reports for Greater Caribbean Learning Resources, Inc. Reports often include a complete predictive and historical analysis with payment and financial information; information on the identity, operations, profitability and stability of Greater Caribbean Learning Resources, Inc; Details on the company's history, the business background of its management, special events and recent company news. Download Greater Caribbean Learning Resources, Inc. financial and company reports.

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Step 1 v. GPA

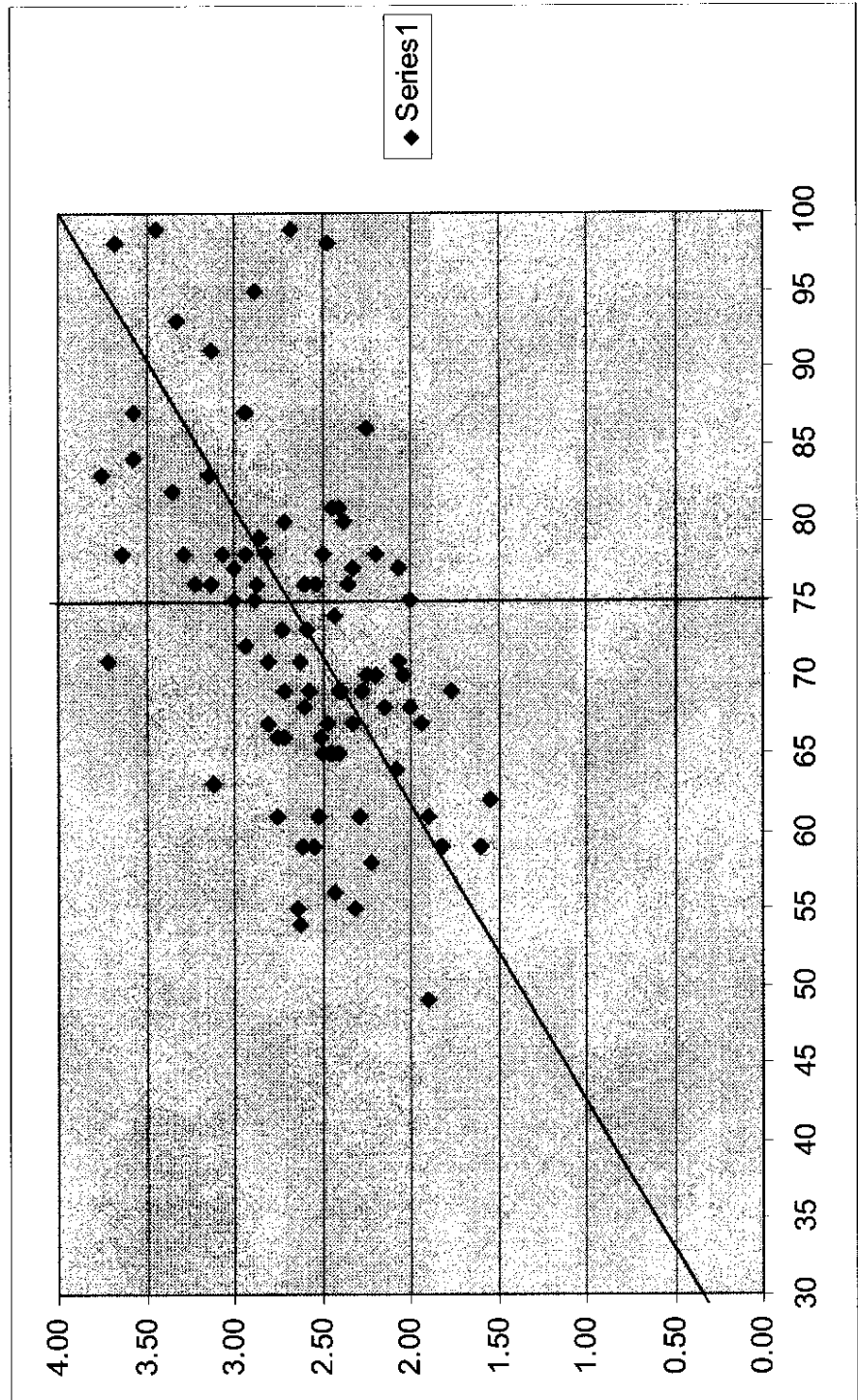


EXHIBIT 7

From Beginning with AUA	Step 1	GPA
Abdullah, Sirhan	61	2.28
Adamu, Hephzibah	58	2.22
Ajala, Khaalisha	81	2.44
Abdullah, Sirhan	61	2.52
Ahmadi, Yunus	75	3.00
Ajayi, Olumide	80	2.71
Akitan, Abosede	82	3.35
August, Mihenka	65	2.44
Bastien, Carl-Frederic	78	2.20
Beckwith, Micheal	78	3.63
Beranger, Alexandria	72	2.93
Boakye, Kwaku	64	2.08
Bohnert, Shannon	54	2.62
Cafiero, Ralph	65	2.45
Cheruku, Sreekanth	95	2.88
Crew Erica	76	3.22
Dabas Vivek	75	2.00
Devaney, Thomas	59	1.60
Dhillon, Rupeet	49	1.89
El-Sherif, Dana	77	2.06
Eni, Eni	63	3.12
Falter, Keith II	87	3.57
Fasihy, Shahram	71	2.81
Felix, Ashvin	70	2.25
France, Kenneth	75	2.88
Ghani, Helai	81	2.40
Gnanashekar, Ephraim	69	2.27
Gray, Sanjiv	98	3.67
Hadawy, Angel	71	2.62
Haddad, Mousa	65	2.50
Hang, Tammy	67	1.93
Harden, Kimberly	77	2.33
Hasselfeld, Randi	87	2.94
Huda, Sophia	69	2.39
Isacoff, Adam	76	2.53
Jackson, Larry	73	2.58
Johnsen, Jay	84	3.57
Jones, Takaya	78	2.93
Kalaria, Neha	74	2.43
Kannankeril, Joe	56	2.43
Kaur, Harjeet	73	2.73
Kohli, Navreet	68	2.60
Kurien, Alvin	61	1.90
Lapikov, Vitaliy	78	2.50
Lhungay, Cherie	83	3.14
Lima, Ateaya	66	2.51
Merkley, Kenneth	66	2.71
Miskin, Chandrabhaga	76	3.13
Monroe, Mariam	55	2.31
Muhammad, Aqeel	70	2.20
Nakhwal, Sukhminder	61	2.75

Nwagbo, Anthonia	66	2.75
Okoro, Philip	67	2.80
Okoronkwo, Earnest	67	2.47
Olorunnisola, Moses	71	3.71
Oyelowo, Doyin	78	3.29
Pate, Amy	91	3.13
Pate, Judy	65	2.40
Patel, Samir	77	3.00
Patel, Amit	98	2.47
Patel, Bhavika	78	3.06
Pennisi, Dominic	68	2.14
Petrova, Veronika	55	2.64
Polynice, Judette	93	3.33
Rao, Panisri	76	2.60
Rao, Ryan	99	3.44
Ray, Asheesh	86	2.25
Romanik, Nikki	59	2.61
Saleh, Tarek	80	2.38
Sarathchandra, Janaka	59	1.82
Schroeder, Hilary	59	2.54
Selvarajah, Priya	69	1.76
Shodunke, Temitope	72	2.94
Shoja, Pantea	83	3.75
St.Denis, Anthony	78	2.82
Tadros, Adeeb	68	2.00
Tahir, Hina	76	2.35
Tammara, Anita	70	2.04
Thoman, Stacey	79	2.86
Thomas, Lisa	69	2.57
Tiwana, Raju	69	2.40
Torabi, Radmehr	99	2.67
Toussaint, Pierrette	67	2.33
Uppal, Amandeep	76	2.87
Vijayan, Pravin	69	2.72
Yun, Roderick	71	2.07
Zverinsky, Aleksandr	62	1.54

Transfer Students	Step 1	GPA	From Beginning with AUA	Step 1	GPA
			Adu-Sarkodie, Nana	did not sit	
			Adu, Tameka	did not sit	
Abdul-Hak, Hassane	did not sit		Adesope, Stella	did not sit	
			Adamu, Hephzibah	58	
Aguilera, Francia	68	4.00	Abdullah, Sirhan	61	2.52
			Aguiar, Martine	did not sit	
			Ahmad, Ala	did not sit	
			Ahmed, Anjum	did not sit	
Ali, Husam	60	2.20	Ahmadi, Yunus	75	3.00
			Ajala, Khaalisha	81	
Addhavarapu, Venkatesh	67	2.25	Ajayi, Olumide	80	2.71
			Akpata, Emmanuel	did not sit	
			Akujobi, Chizoma	did not sit	
Ali, Husam	60		Alcalde, Tara	did not sit	
			Ali, Waseem	did not sit	
Andhavarapu, Venkatesh	67		Ansari, Osama	81	4.00
			Ansari, Rashid Moin	did not sit	
			Anthony, Sandra	did not sit	
			Atabbi, Ali	did not sit	
			Akitan, Abosede	82	3.35
Ashley, Cherrise	64	2.22	August, Milhenka	65	2.44
August, Elizabeth	80	3.00	Aziz, Ammarah	did not sit	
			Azizian, Neda	did not sit	
Bagenholm, Allyson	76	4.00	Brown-Joseph, Ann-Marie	did not sit	
			Bangthamai, Tara	did not sit	
			Bastien, Carl-Frederic	78	2.20
Baghdasarian, Ara	did not sit		Beckwith, Micheal	78	3.63
Baker, Iyad	88	3.50	Beranger, Alexandria	72	2.93
Barrett, Shean	68	3.50	Boakye, Kwaku	64	2.08
Bangthamai, Tara	did not sit		Bansgopaul, Dillon	did not sit	
Basque, Carl-Frederic	did not sit		Beranger, Alexandria	72	
Batra, Amit Paul	did not sit		Bastien, Carl-Frederic	78	
Belpulsi, Danamarie	65		Bhati, Amar	did not sit	
Bhosle, Sangram	did not sit		Beckwith, Micheal	78	
			Boakye, Kwaku	64	
			Bernot, Sindy	did not sit	
			Brar, Preetkanwal(Rimy)	did not sit	
Budhraj, Vikram	86		Brumett, William	did not sit	
			Bohnert, Shannon	54	2.62
Betz, Milica	87	3.67	Cafiero, Ralph	65	2.45
Bhaskarla, Niveditha	76	3.50	Cheruku, Sreekanth	95	2.88
Budhraj, Vikram	86	3.42	Crew Erica	76	3.22
Chineme, Jessica	71	4.00	Dabas Vivek	75	2.00
Chumak, Maxim	77	3.67	Devaney, Thomas	59	1.60
Corbin, Aaron	68	2.60	Dhillon, Rupeet	49	1.89
Crespo-Valez, Carmen	62	4.00	El-Sherif, Dana	77	2.06
Davis, Barbara	73	3.25	Eni, Eni	63	4.00
Decoteau, Carlond	55	3.00	Falter, Keith II	87	3.57
Esmaeili, Ehsan	75	4.00	Felix, Ashvin	70	2.25
Faustin, Guerry	78	2.64	France, Kenneth	75	2.88

Ferrol, Isaline	75	2.63	Ghani, Helai	81	2.40
Franklin, Bina	75	4.00	Gnanashekar, Ephraim	69	2.27
Freier, Richard	79	4.00	Gray, Sanjiv	98	3.67
Gonzalez, Claudia	40	2.00	Hadawy, Angel	71	2.62
Ioffe, Julia	76	3.58	Haddad, Mousa	65	2.50
Jain, Atul	70	3.00	Hang, Tammy	67	1.93
Jiansakul, Thanavut	83	3.78	Harden, Kimberly	77	2.33
Kamash, Tamer	64	2.50	Hasselfeld, Randi	87	2.94
Kidd, Vicki	79	4.00	Isacoff, Adam	76	2.53
Knowles-James, Cerise	68	2.43	Jackson, Larry	73	2.58
Kodali, Smila	75	3.13	Johnsen, Jay	84	3.57
Kumar, Seema	80	2.71	Jones, Takaya	78	2.93
Lafond, Fritzanella	71	3.00	Kalaria, Neha	74	2.43
Lanphear, Eric	64	4.00	Kannankeril, Joe	56	2.43
Linkowski, Micheal	59	2.71	Kaur, Harjeet	73	2.73
Loza, Alejandro	75	4.00	Kohli, Navreet	68	2.60
Marin, Louis	77	3.00	Kurien, Alvin	61	1.90
Martin, Ravonna	72	4.00	Lapikov, Vitaliy	78	2.50
Oprea, Micheal	82	4.00	Lhungay, Cherie	83	3.14
Oyedepo, Babadele	79	3.82	Merkley, Kenneth	66	2.71
Panchal, Roshni	77	4.00	Miskin, Chandrabhaga	76	3.13
Patel, Bhavika	78	3.06	Monroe, Mariam	55	2.31
Patel, Dipesh	80	3.00	Muhammad, Aqeel	70	2.20
Patel, Rupal	77	3.70	Nakhwal, Sukhminder	61	2.75
Preciado Jeffrey	39	3.00	Nwagbo, Anthonia	66	2.75
Rakalla, Gurvinder	46	3.00	Okoro, Philip	67	2.80
Reilly, Thomas	95	3.88	Okoronkwo, Earnest	67	2.47
Robinson, Gail	59	3.50	Olorunnisola, Moses	71	3.71
Roever, Christopher	71	4.00	Oyelowo, Doyin	78	3.29
Rojas, Luis	78	3.67	Pate, Amy	91	3.13
Shahani, Monica	76	4.00	Pate, Judy	65	2.40
Soresen, Hollie	64	3.50	Patel, Samir	77	3.00
Shahzad, Humara	69	3.00	Patel, Amit	98	2.47
Soyoye, Tajudeen	78	4.00			
Stair, Erin	80				
Stevenson, Clinton	57	3.50			
Syed, Hassan	68	3.00			
Thomas, Debra	58	3.00			
Thomas, Lisa	69	2.69			
Woodard, Jameson	89	3.89			
Zimmerman, Sara	72	4.00			
Lambert, Nahesi	76	3.11			
Martin, Nathan	64	2.25			

	Vth Semester May 07			
	Baltimore	E-mail	GPA	Proj. I
1	Beheshtin, Darya	daryabeheshtin@yahoo.co	2.27	61.21212
2	Dube, Alok	alook@yahoo.com	1.71	44.24242
3	Fokkoun-Ngassa, Emm	tbajou@yahoo.com	3.00	83.33333
4	Gaymes, Bianca	bgaymes@yahoo.com	1.92	50.60606
5	Glasgow, Maurene	maureneglasgow@hotmail	3.33	93.33333
6	Grover, Neha	nehaliji@yahoo.com	2.00	53.0303
7	Kay, Aras	araskay@gmail.com	2.08	55.45455
8	Lecavalier, Annie	lecavaliera@hotmail.com	3.55	100
9	Leonard, Sara	sara6610@hotmail.com	2.57	70.30303
10	Lukanda, Clarisse	claracuty83@hotmail.com	1.69	43.63636
11	Mathai, James	jmathai@mac.com	1.77	46.06061
12	Meek, Steven	meek00211@yahoo.com	2.07	55.15152
13	Meredith, Mary Elisabe	marylew99@hotmail.com	2.27	61.21212
14	Nicholson, Thema	tnicholson@excite.com	1.69	43.63636
15	Ogunlade, Olubusola	sola247@yahoo.com	2.91	80.60606
16	Oolut, Jessica	j_oolut@hotmail.com	2.23	60
17	Sharif, Yasmin	ysharif8@yahoo.com	2.50	68.18182
18	Soltani, Sanaz	nickysoltani@gmail.com	2.36	63.93939
19	Sridhar, Abiram	mysriram@aol.com	1.38	34.24242
20	Wayal, Vinay	vwayalmd@gmail.com	1.64	42.12121
21	Jastrzembski, Kelly	kd-jazzeri@cox.net	2.36	63.93939
T 23	Merrill, Veronika	vdenae@hotmail.com		-7.575758
T 23	Rayan, Adrian	adnanrayan@gmail.com		-7.575758
24	Ahsan, Afzal			-7.575758

American University of Antigua College of Medicine
 V Semester - Preliminary Clinical Training
 Pontiac Michigan - St Joseph Mercy Oakland

Final Grades by Component - Fall, 2007																			
Code	Attendance		Prac Session		Outpatient		El Verbal Presnt		Portfolio		Quizzes		Written Ex		Practical Ex		Final Grade Adjusted		
	10%	Score	PT	Score	5%	Score	PT	Score	5%	Score	PT	Score	20%	Score	PT	Score			
1	92	9.2	92	4.6	100	5.0	100	5.0	100	10.0	54	18.9	77	81	16.2	95	9.5	78	C
2	100	10.0	100	5.0	80	4.0	100	5.0	100	10.0	57	20.1	80	84	16.8	96	9.5	79	C
3	100	10.0	100	5.0	83	4.2	100	5.0	100	10.0	56	19.6	70	74	14.8	80	8.0	77	F
4	75	7.5	75	3.8	86	4.3	100	5.0	100	10.0	62	21.7	86	90	18.0	76	7.5	76	C
5	100	10.0	100	5.0	96	4.8	100	5.0	100	10.0	70	24.4	84	88	17.6	85	8.5	83	B
6	100	10.0	100	5.0	96	4.8	100	5.0	100	10.0	65	22.6	73	77	15.4	85	8.5	83	C(-)
7	100	10.0	100	5.0	95	4.8	100	5.0	100	10.0	62	21.6	71	75	15.0	80	8.0	80	F
8	100	10.0	100	5.0	92	4.6	100	5.0	100	10.0	58	20.4	79	83	16.6	80	8.0	81	B
9	100	10.0	100	5.0		0.0	100	5.0	100	10.0	70	24.4	87	92	18.4	93	9.3	82	B
10	100	10.0	100	5.0		0.0	100	5.0	100	10.0	68	23.9	78	82	16.4	80	8.0	83	B

- (1) Failed Final Exam. Remedial score 78. Final Grade: C(-)
 Failed Final Exam. Has not taken remedial
 (3) Failed Final Exam. Did take remedial and failed
 Did not have OP rotation. Total score / 95
 (4) Did not take OP rotation. Total Score / 95

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

RECEIVED
JAN 19 2009

STEVEN WOODWARD,

BY: _____

Plaintiff,

v.

TRINITY HEALTH-MICHIGAN,
a Michigan Nonprofit corporation,
SUSAN CATHERINE ZONIA, an Individual,
AMERICAN UNIVERSITY OF ANTIGUA
COLLEGE OF MEDICINE,
a Foreign corporation,

Defendants.

"OAKLAND"
"COUNTY"

07-088103-CZ



JUDGE SHALINA KUMAR
WOODWARD, STEV v TRINITY HEAL

NICOLETTI & ASSOCIATES, P.C.
Paul J. Nicoletti (P44419)
Attorney for Plaintiff
39520 Woodward Avenue, Suite 200
Bloomfield Hills, MI 48304
248.203.7800

LAW OFFICE OF DAVID B. GUNSBERG, P.C.
David B. Gunsberg (P24235)
*Attorney for Defendants Trinity Health-
Michigan and Susan Catherine Zonia; Co-
Counsel for Defendant American University of
Antigua College of Medicine*
322 North Old Woodward Avenue
Birmingham, MI 48009
248.646.9090

LAW OFFICES OF BRYAN L. SCHEFMAN
Bryan L. Schefman (P35435)
*Attorney for Defendant American University
of Antigua College of Medicine*
322 North Old Woodward Ave.
Birmingham, MI 48009
248-723-1650

DEFENDANTS TRINITY HEALTH-MICHIGAN and SUSAN ZONIA'S
CASE EVALUATION STATEMENT

DATE & TIME:

8:40 a.m., January 22, 2009

EVALUATORS:

Robert L. Stefani, Douglas C. Bernstein, Thomas J. Gagne [REDACTED]

EXHIBIT 9 [REDACTED]

In any event, in early December 2007, before Dr. Zonia's December 17 letter, Woodward took and failed the fifth semester Final Exam. AUA required an 80% score to pass the final exam. Based on AUA's curve for the exam, which was set by AUA in Antigua, Woodward scored a 75% on the final exam. Woodward received an "F" for the fifth semester.²

Woodward appealed his dismissal (but not the "F" for fifth semester) to Neil Simon at AUA. An appeal hearing was scheduled for July 10, 2008, but (again) Woodward refused to appear. The appeal was (apparently) denied. Zonia was not involved in the scheduling of the appeal procedures.

Woodward has not invoked in any appeals of his failing grade, requested to retake the fifth semester, sought readmission to AUA, or tried to enter any other medical school. Since December 2007, Woodward has been living on a sailing yacht in St. Maarten, scuba diving.

AUA issues a Student Handbook (**Exhibit 9**) which has disciplinary procedures. Woodward claims the Student Handbook is a "contract" between Woodward and AUA which was "interfered with" by Dr. Zonia. Woodward acknowledged that the AUA Disciplinary Committee could consider his unprofessional behavior and discipline him, including dismissal (Woodward Dep., pp. 149-150). In his amended complaint, which was untimely filed and not served, Woodward claims that the "breach" by AUA was that he was not given a "timely" appeal hearing on July 10, 2008, i.e. within 14 days of filing his appeal. Woodward, however, testified that he made a conscious decision not to

² Woodward claims he actually passed the final exam, but he never appealed his failing grade, although allowed to appeal under the Student Handbook.

L A W O F F I C E
of
D A V I D B . G U N S B E R G

*Tell him how to
spell his
name*

November 3, 2008

Paul J. Nicoletti, Esq.
39520 Woodward Ave, Suite 200
Bloomfield Hills, MI 48304

Re: Steven Woodward v Trinity Health-Michigan, et al
Case No. 07-088103-CZ / Judge Shalina Kumar

Dear Mr. Nicoletti:

Enclosed please find Defendants Trinity Health-Michigan and Susan Catherin Zonia's Answer to Plaintiff's Motion for Entry of Default and Judgment, Brief in Support of Answer to Plaintiff's Motion for Entry of Default and Judgment, and Proof of Service.

Very truly yours,

David B. Gunsberg / lsm
David B. Gunsberg

DBG/lsm
Encl(s)

RECEIVED
NOV 4 2008

BY:.....

EXHIBIT 10

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

STEVEN WOODWARD,

Plaintiff,

v.

TRINITY HEALTH-MICHIGAN,
a Michigan Nonprofit corporation,
SUSAN CATHERINE ZONIA, an Individual,
AMERICAN UNIVERSITY OF ANTIGUA
COLLEGE OF MEDICINE,
a Foreign corporation,

Defendants.

"OAKLAND"
"COUNTY"

07-088103-CZ



JUDGE SHALINA KUMAR
WOODWARD, STEV v TRINITY HEAL

NICOLETTI & ASSOCIATES, P.C.
Paul J. Nicoletti (P44419)
Attorney for Plaintiff
39520 Woodward Avenue, Suite 200
Bloomfield Hills, MI 48304
248.203.7800

LAW OFFICE OF DAVID B. GUNSBURG, P.C.
David B. Gunsberg (P24235)
*Attorney for Defendants Trinity Health-Michigan
and Susan Catherine Zonia*
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248.646.9090

LAW OFFICES OF BRYAN L. SCHEFMAN
Bryan L. Schefman (P35435)
*Attorney for Defendant American University of Antigua
College of Medicine*
322 North Old Woodward Ave.
Birmingham, MI 48009
248-723-1650

**Brief in Support of Answer to Plaintiff's Motion for Entry of Default
and Judgment**

STATEMENT OF FACTS

The Case:

This is a Motion to Compel Discovery in a meritless case in which Plaintiff "washed out" of the fifth semester of his second year at the American University of Antigua Medical School (AUA). This case is not about

From: Eric A Buikema (ebuikema@cardellilaw.com)
To: steve_1_woodward@yahoo.com;
Date: Wed, November 3, 2010 5:58:29 PM
Cc:
Subject: Re: AUA v Woodward- deposition

We will file a motion and seek costs of same in that event

On Nov 3, 2010, at 4:11 PM, "Steve Woodward" <steve_1_woodward@yahoo.com> wrote:

I will not be available tomorrow as previously stated.

This email and any attachments are intended for the sole use of the named recipient(s) and contain(s) confidential information that may be proprietary, privileged or copyrighted under applicable law. If you are not the intended recipient, do not read, copy, or forward this email message or any attachments. Delete this email message and any attachments immediately.

From: Eric A Buikema <ebuikema@cardellilaw.com>
To: Steve Woodward <steve_1_woodward@yahoo.com>
Cc: Kathryn Zalewski <kzalewski@cardellilaw.com>
Sent: Wed, November 3, 2010 11:06:45 AM
Subject: Re: AUA v Woodward- deposition

We will expect to see you tomorrow then.

Regards,

Eric Buikema

On Nov 3, 2010, at 10:55 AM, "Steve Woodward" <steve_1_woodward@yahoo.com> wrote:

I will be unavailable all next week.

I am will not disclose any exhibits at this time per FRC 26(d)(3).

Steven Woodward

This email and any attachments are intended for the sole use of the named recipient(s) and contain(s) confidential information that may be proprietary, privileged or copyrighted under

EXHIBIT II

applicable law. If you are not the intended recipient, do not read, copy, or forward this email message or any attachments. Delete this email message and any attachments immediately.

From: Kathryn Zalewski <kzalewski@cardellilaw.com>
To: Steve Woodward <steve_l_woodward@yahoo.com>
Sent: Tue, November 2, 2010 4:46:23 PM
Subject: AUA v Woodward- deposition

Mr. Woodward,

Mr. Buikema is available on Monday, November 8 at 10:00 a.m. for your deposition. Please advise of your availability as soon as possible.

Sincerely,

Kathy Zalewski
Legal Secretary
Cardelli, Lanfear & Buikema, P.C.
322 W. Lincoln
Royal Oak, MI 48067
(248) 544-1100
kzalewski@cardellilaw.com

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